

Arnold & Porter

Michael Krouse
+1 212.836.7750 Direct
Michael.Krouse@arnoldporter.com

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Application granted on consent.

September 10, 2024

SO ORDERED:
Date: 9/11/24

Richard M. Berman
Richard M. Berman, U.S.D.J.

BY ECF AND ELECTRONIC MAIL

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Keonne Rodriguez, et al.*, 24 Cr. 82 (RMB)

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, who is a defendant in the above-referenced matter. A court conference is scheduled for 1:00 p.m. on Tuesday, September 17, 2024. We are planning to meet with Mr. Rodriguez in the days surrounding the conference to discuss the case and discovery. Accordingly, we respectfully request that Mr. Rodriguez be permitted to travel to New York on Sunday, September 15, and return to his home in the Western District of Pennsylvania on Friday, September 20. We have conferred with the Government and Pretrial Services, each of whom has no objection to this request.

If the Court grants this request, Mr. Rodriguez will provide Pretrial Services with his itinerary, including hotel information, in advance of travel. We are available to answer any questions the Court may have.

Respectfully submitted,

Michael Kim Krouse

cc: AUSA Andrew Chan
AUSA David Felton